

UNITED STATES BANKRUPTCY COURT

Eastern District of Pennsylvania

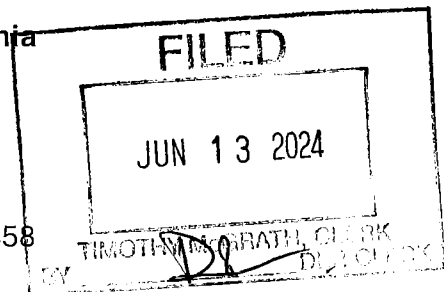
Philadelphia Division

Campisi Construction, Inc.

: Chapter 7

: Case No. 14-12458

Debtor. :



ANSWERS TO ECI,LLC MOTION TO REMAND

Co-debtor, Anthony Campisi, moves this Honorable Court to DENEY ECI's Motion to Remand.

1. Paragraph 9 of the Stipulation and Consent Order of Settlement clearly states this Court holds jurisdiction of the Settlement Agreement.
2. ECI is now back pedaling to avoid a hearing on all his wrong doings.
3. All ECI and Cougar claims are false claims.

a) ECI claim #7 secured. In my previous filing ECI claim and judgement were based on CASPA interest. Please see attached Decision where CASPA was not awarded.

EXHIBIT A

b) ECI claim #8 all invoices were paid plus dated before judgment was entered attached is Forensic accounting report.

EXHIBIT B

c) Cougar claim # 9 is a fake lease signed for his financing. Dave Spause needed a signed lease to by that building. He or Cougar did not own the property. The lease was a two year lease, Campisi never occupied, paid security deposit or paid a dime. **Cougar renewed the lease for another two years**, what landlord would do that?? Better yet what Judge would believe that.

EXHIBIT C

d) claim #11 interest and attorneys fee's under CASPA. Refer back to decision ECI was not awarded CASPA **EXHIBIT D**

4. The Motion to approve settlement paragraph 6 states parties propose to resolve within the principles of **In re Martin 91 F.3d 389, 393 (3d Cir. 1996)**

The first factor probability of success in the litigation. Please find attached Montco Case 2013-34907 Doc 80 Motion for Summary Judgement against Campisi Construction ONLY.

5. Cougar states the proof of claim has been litigated (paragraph 5 UNDER CONTEST.) Settlement agreement says settled matters *sub judice another misrepresentation* by Robert Saraceni and Spause. **EXHIBIT E**

6. Saraceni and Spause have done this with each claim, never served the trustee, got judgments and are trying to collect on myself.

7. ECI had stolen abandoned equipment on JULY 2 2016 and newer equipment stating the Trustee allowed him to gather and assemble the assets.

8. ECI's stay was lifted April 2 ,2018 and they were to pursue Anthony Campisi as an individual. Each listed on the Order by Judge Fitzimon had been violated. **EXHIBIT G**

In conclusion , Saracini/Spause were afraid to meet me in court .I caught on to their game years ago, now he has put himself in a real pickle. Wherefor, Co- Debtor, Anthony G Campisi prays the Motion to Remand is denied and a trial on The Motion for sanctions be heard.

Anthony Campisi



6/13/2024
